## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re GRUPO TELEVISA SECURITIES LITIGATION

Civil Action No. 1:18-cv-01979-LLS

CLASS ACTION

## **DECLARATION OF DAVID B. ANDERS**

Pursuant to 28 U.S.C. § 1746, I, David B. Anders, declare as follows:

- 1. I am an attorney at the law firm Wachtell, Lipton, Rosen & Katz, counsel for Grupo Televisa, S.A.B. ("Televisa"), Emilio Fernando Azcárraga Jean III, and Salvi Rafael Folch Viadero (together, "Defendants") in the above-captioned proceeding.
- 2. As described in the "Declaration of Justin R. Hughes of Kroll Settlement Administration LLC Re: Class Action Fairness Act Notice," dated August 7, 2023 ("Hughes Declaration"), attached as Exhibit A hereto, Kroll Settlement Administration LLC ("Kroll") sent a CAFA notice package (the "Initial CAFA Notice") on behalf of Defendants, as required by the federal Class Action Fairness Act of 2005 (CAFA), 28 U.S.C. § 1715, to 57 federal and state officials on March 7, 2023. The Initial CAFA Notice was mailed via USPS First Class Mail to 57 officials, including the Attorney General of the United States and attorneys general of each of the 50 states, the District of Columbia, and the United States Territories.
- 3. In accordance with 28 U.S.C. § 1715(b), the Initial CAFA Notice was sent within ten days of the parties' filing of the proposed settlement to the Court (*i.e.*, within ten days of February 28, 2023).

4. As described in the Hughes Declaration, Kroll sent a second CAFA notice package

(the "Supplemental CAFA Notice") on behalf of Defendants, as required by the federal Class

Action Fairness Act of 2005 (CAFA), 28 U.S.C. § 1715, to 57 federal and state officials on April

21, 2023. The Supplemental CAFA Notice was mailed via FedEx Priority Overnight, FedEx

International Priority or United States Priority Mail to 57 officials, including the Attorney General

of the United States and attorneys general of each of the 50 states, the District of Columbia, and

the United States Territories.

5. In accordance with 28 U.S.C. § 1715(b), the Supplemental CAFA Notice was sent

within ten days of the parties' filing of the amended proposed settlement to the Court (i.e., within

ten days of April 15, 2023).

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct to the best of my knowledge.

Executed in New York, New York, on this 7<sup>th</sup> day of August, 2023.

/s/ David B. Anders

David B. Anders